

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

JOHN DOE

Plaintiff,

v.

CHRISTOPHER A. WRAY, Director of the  
Federal Bureau of Investigation, in his  
official capacity,

Defendants.

**Civil Action No. 1:24-cv-02365**

Serve also: Hon. Jessica D. Abers  
United States Attorney for the Eastern  
District of Virginia  
C/O Civil Process Clerk  
Justin W. Williams United States Attorney's  
Building  
2100 Jamieson Ave  
Alexandria, VA 22314

Serve also: Hon. Merrick T. Garland  
Attorney General of the United States  
United States Department of Justice  
950 Pennsylvania Avenue, NW,  
Washington, DC 20530-0001

**PLAINTIFF'S MOTION FOR LEAVE TO PROCEED IN PSEUDONYM OR, IN  
THE ALTERNATIVE, FOR A PROTECTIVE ORDER**

The Plaintiff, John Doe, moves for an Order granting leave to proceed in pseudonym or, in the alternative, for a protective order. For the reasons explained in the accompanying Memorandum in Support of this motion, and in the interest of justice, leave should be granted. The Plaintiff has supplied a proposed order herewith.

Dated: December 27, 2024

Respectfully Submitted,

John Doe

/s/ Susan Mary Rotkis

Susan Mary Rotkis, VSB 40693  
Consumer Justice Law Firm PLC  
2290 East Speedway Blvd.  
Tucson, AZ 85719  
Direct: 602-807-1504  
Facsimile: 718-715-1750

E-mail: srotkis@consumerjustice.com

*Attorney for Plaintiff,  
John Doe*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27<sup>th</sup> day of December 2024, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system. I will then send the document and a notification of such filing (NEF) to the following party via process server and by USPS first class mail, postage prepaid.

Hon. Jessica D. Abers  
United States Attorney for the Eastern District of Virginia  
C/O Civil Process Clerk  
Justin W. Williams United States Attorney's Building  
2100 Jamieson Ave  
Alexandria, VA 22314

Hon. Merrick T. Garland  
Attorney General of the United States  
United States Department of Justice  
950 Pennsylvania Avenue, NW,  
Washington, DC 20530-0001

Christopher Wray  
Director of the Federal Bureau of Investigation, in his official capacity  
935 Pennsylvania Avenue,  
NW, Washington DC 20531

/s/ Susan Mary Rotkis  
Susan Mary Rotkis, VSB 40693  
Consumer Justice Law Firm  
2290 East Speedway Blvd.  
Tucson, AZ 85719  
Direct: 602-807-1504  
Facsimile: 718-715-1750

E-mail: [srotkis@consumerjustice.com](mailto:srotkis@consumerjustice.com)

*Attorney for Plaintiff,  
John Doe*